

From: Archer Richardson [mailto:archerj@mcn.org]
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To: Fish & Game Commission; MLPAComments
Cc: ---John Ugoretz
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F & G Commission
MLPA comments
Scientist
Stakeholders
General Public

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“SCIENCE”

In order for science to be effective and to work correctly...**we must have data, biologically data.** The data that we do not have at this time to implement any or all MPA's in the North Central Coast area. At the SAT meeting Jan. 8, 2008 at the San Francisco Airport members of the SAT staff used the following: “*assume*”, “*probably*”, “*think would be valid*,” “*assumptions*”, “*potentially*”, “*assuming*”, and my favorite, “*in the back of my mind...I don't know.*” **Now what kind of science is this?**

Before placement of any MPA studies should be started and completed to backup the need if any for a Marine Protection Area. Studies or observations done 5 years down the road will have no meaning if we do not know what was there upon the implementation of a MPA. **Areas that are UNZONED are just as important to areas that are ZONED.**

What is the impact on the UNZONED areas caused by the ZONED areas? It will be impossible to know unless a biological study is done before the zoning and law is enacted. Scientist have no idea what will happen....do they? Zoned areas might improve in species and numbers, but to what degree? Will the bleed over from a SMR support the over fishing pressure of the adjacent UNZONED area? Will the UNZONED area be hit so hard by fishing pressure that it will fall below the standards or baseline? And again we do not know what the standards; baseline or minimal sustainability is without a scientific biological study before implantation of these MPA's. And again, **we have insufficient scientific and biological study data!**

I urge all involved to stop and think about this for a minute. What type of scientific data do we have to implement this State mandated legislation? **NEXT TO NOTHING!!!** Therefore placement of all MPA's, (SMR's, SMP's & SMCA's) are a guess, gamble and shot in the dark without major underwater, above water studies of all species mentioned for protection in the study region. **“Show me the numbers”**

Early in the MLPA process (Gualala, 10-16-08) Exec. Director Ken Wiseman stated that “we are going to do this once and do it right.” At the last meeting in Gualala (02-05-08) Exec. Director Wiseman stated “this is not a perfect process.” Now which one is correct? **So let's slow down and do this correctly!**

A concerned and caring fisherman, Archer J. Richardson, Stewarts Point, CA.